

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: MARK ERIC BAILEY, : Chapter 13  
A/K/A MARK BAILEY, A/K/A : Case No. 16-10825  
MARK E. BAILEY, :  
DEBTOR :

**NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE**

To the Debtor and all parties in interest, NOTICE is hereby given:

That the Debtor herein has filed a Motion to Modify Debtor's Plan Post-Confirmation providing for payments of \$500.00 for an additional 34 months and includes 5 lump sum payments of \$12,000.00 each, on or about 12/31/20, 6/30/21, 12/31/21, 6/30/22, and 12/31/22, and also includes amounts already distributed by the Trustee to creditors.

1. Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

2. If you do not want the court to grant the relief sought in the Motion or if you want the court to consider your views on the Motion, then on or before **June 1, 2020** you or your attorney must file a response to the Motion (see Instructions on next page)

3. A hearing on the Motion is scheduled to be held before the Honorable Eric L. Frank, courtroom #1, Robert N.C. Nix Sr. Federal Courthouse, 900 Market Street, Philadelphia, PA 19107 for **June 9, 2020 at 1:00 p.m.** Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing.

4. If you do not file a response to the Motion, the court may cancel the hearing and enter an order granting relief requested in the Motion.

5. You may contact the Bankruptcy Clerk's Office for Reading cases at 610-208-5040 and for Philadelphia cases at 215-408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

6. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney whose name and address is listed on the next page of this Notice.

**Filing Instructions**

7. If you are required to file documents electronically by Local Bankruptcy Rule 5005-1, you must file your response electronically.

8. If you are not required to file electronically, you must file your response at:

Clerk, U.S. Bankruptcy Court  
Robert N.C. Nix Sr. Federal Courthouse  
900 Market Street  
Philadelphia, PA 19107

9. If you mail your response to the Bankruptcy Clerk's Office for filing, you must mail it early enough so that it will be received on or before the date stated in paragraph 2 on the previous page of this Notice.

10. On the same day that you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the Movant's attorney:

John A. DiGiambardino, Esquire  
Case & DiGiambardino, P.C.  
845 N. Park Rd., Ste. 101  
Wyomissing, PA 19610  
610-372-9900 610-372-5469 – fax  
[jad@cdllawoffice.com](mailto:jad@cdllawoffice.com)

Date: 5/11/2020

s/John A. DiGiambardino, Esquire